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SUSAN Y. SCONE  
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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA

v.

SHAUN W. BRIDGES & CARL MARK  
FORCE

Defendants.

15-CR-0319-RS

**NOTICE OF RELATED CASES**

**FILED UNDER SEAL**

UNITED STATES OF AMERICA

v.

BTC-E, A/K/A CANTON BUSINESS  
CORPORATION,  
ANDREY NIKONOROV,  
STANISLAV GOLOVANOV,  
ALEXANDER BUYANOV, and  
ALEXANDER VINNIK,

Defendants.

16-CR-227-SI (UNDER SEAL) ✓

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12 SAN FRANCISCO DIVISION  
13

14 UNITED STATES OF AMERICA )

15-CR-0319-RS

15 v. )

**NOTICE OF RELATED CASES**

16 SHAUN W. BRIDGES & CARL MARK )  
17 FORCE )

**FILED UNDER SEAL**

18 Defendants. )  
19

20 UNITED STATES OF AMERICA )

16-CR-227-SI (UNDER SEAL)

21 v. )

22 BTC-E, A/K/A CANTON BUSINESS )  
CORPORATION, )  
23 ANDREY NIKONOROV, )  
STANISLAV GOLOVANOV, )  
24 ALEXANDER BUYANOV, and )  
ALEXANDER VINNIK, )  
25

26 Defendants. )  
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28

1 The United States of America, pursuant to Local Criminal Rule 8-1, hereby notifies the Court  
2 that the above-captioned criminal cases are related.

3 The first case involved an investigation into two former federal agents who were members of the  
4 Baltimore Silk Road Task Force. It involved crimes ranging from obstruction to extortion to money  
5 laundering, and stemmed principally from the defendants' theft and use of Bitcoin, a digital currency.  
6 The Court may recall that FORCE was alleged to have sent at least \$235,000 in criminal proceeds to an  
7 offshore digital currency exchange, BTC-e, for laundering. What the Court may not be aware of is that  
8 the government is continuing to investigate BRIDGES for additional crimes involving theft of bitcoin  
9 (and laundering of that bitcoin) that defendant BRIDGES committed after entering his Plea Agreement  
10 in this case. The government's investigation to date reveals that those additional stolen bitcoin went to  
11 BTC-e, the same offshore digital currency exchange.

12 The second case is a case against that offshore digital currency exchange, i.e. BTC-e, and its  
13 known operators and administrators and benefactors. The charges recently returned by the Grand Jury  
14 are for conspiracy to commit money laundering in violation of 18 U.S.C. Section 1956(h) and for  
15 operation of an unlicensed money service business in violation of 18 U.S.C. Section 1960. The FORCE  
16 and BRIDGES conduct is alleged in the Indictment of this new second case as one of several specified  
17 unlawful activities (SUA) giving rise to the money laundering charges in the first case.

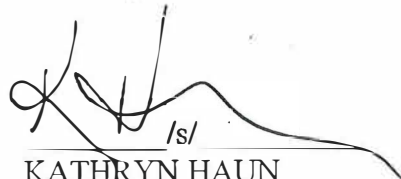
18 It should be noted that the defendants in the second case are believed to currently be in Russia,  
19 such that the second case will remain under seal until such time as the defendant(s) may be apprehended,  
20 perhaps while on travel, through the process of international collaboration and possibly through  
21 extradition proceedings. In other words, it is likely that the second case will remain under seal for quite  
22 some time, even though the first case is not under seal.

23 The government therefore brings this to the attention of the Court since (1) both actions concern  
24 the same alleged transactions; and (2) both actions appear likely to entail substantial duplication of labor  
25 if heard by different Judges, especially given the nature of the new form of technologies and currencies  
26 used, i.e. Bitcoin, blockchain analysis, etc. The expert witness(es) in each case are the same, and the  
27 lead case agent is also the same for both cases.

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2 For these reasons, the government submits that the Court may find that it is appropriate to relate  
3 the cases.

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5 Dated: June 13, 2016

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/s/  
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